

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 22-10141-WGY
)	
SEAN O'DONOVAN,)	
)	
Defendant)	

**GOVERNMENT'S ASSENTED-TO MOTION
FOR DISCOVERY PROTECTIVE ORDER**

The United States respectfully requests that the Court endorse the attached proposed protective order. In support of this motion, the government states:

1. The government anticipates providing, with its automatic discovery, certain confidential records. These consist primarily of business and financial records of third-party entities, as well as third-party telephone records.
2. The proposed protective order would limit the dissemination of these confidential records to the defendant and defense counsel of record, including their investigators, paralegals, law clerks, and assistants. In addition, defense counsel would be permitted to disclose such records to any potential fact witnesses if personal identifying information were redacted, and to any expert witness without redaction provided that the expert witness signs an acknowledgement agreeing to be bound by the terms of the protective order and agrees to destroy all protected records, or return them to defense counsel, at the end of the case.
3. The proposed protective order provides that no person receiving confidential records may further disclose or disseminate them, except as ordered by the Court or agreed upon between defense counsel and the government.

4. The government has conferred with defense counsel, who assents to the relief requested in this motion and stipulates to the attached proposed order.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

Dated: July 1, 2022

By: /s/ Kristina E. Barclay
KRISTINA E. BARCLAY
Assistant U.S. Attorney

JONATHAN JACOBSON
Trial Attorney, Public Integrity Section

Certificate of Service

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on July 1, 2022.

/s/ Kristina E. Barclay
KRISTINA E. BARCLAY